

1.4.3 Completing the W-2 Application

No later than five working days after the applicant submits the signed Application Registration form, the FEP must hold the intake interview with the applicant.

All applicants requesting W-2 services, including JALs*, must sign the Application Summary at the end of the interview. All adults in the W-2 Group must sign the Application Summary.

An application for W-2 is complete when both of the following have occurred:

- The FEP conducted the intake interview during which the FEP entered all eligibility information into CWW; and
- The FEP collected the applicant's signature on the CWW Application Summary that prints from the CWW **Generate Summary** page.

An applicant must sign the Application Summary in the presence of a W-2 agency representative, even if an authorized representative is signing. If the applicant signs with a mark, two witnesses' signatures are required. The second adult in a W-2 Group does not need to sign in the presence of a W-2 agency representative.

In order to secure an applicant's signature on either the Application Registration form or the Application Summary, the FEP may conduct a home visit as a reasonable accommodation. (See [1.3.2](#)) When a home visit is required, the FEP must document the date of the home visit on CARES screen CMCG in case comments.

No change to remainder of 1.4.3

2.10.6.5.1 CMD Placements

When a participant is denied a time limit extension or the participant declines a time limit extension for either the 24-month placement time limit or 60-month state lifetime limit, the FEP must offer the CMD placement. The CMD placement is a case management placement for individuals who have reached their time limit and are no longer eligible for a paid placement.

The goals of the CMD placement are to:

- Help connect the individual to employment;
- Connect the individual and family to services in the community; and

- Reassess on a monthly basis whether the individual should receive a time limit extension.

To be eligible for the CMD placement, the participant must meet W-2 financial and nonfinancial eligibility criteria, with the exception of exceeding the 24-month placement time limit or 60-month state lifetime limit.

Services provided to a CMD participant will depend largely upon the reason for the time limit extension denial or the reason the participant declined a time limit extension and the placement the individual was in at the time of the denial or the time the participant declined a time limit extension. Participants who were denied a time limit extension due to nonparticipation would likely be reassessed to determine activity assignments that best match the participant's needs and encourage increased participation, which may be similar to what was assigned while in the W-2 employment position placement.

FEPs must meet with CMD participants weekly. Every 30 days, the FEP must review the CMD placement. The placement review must be held in a face-to-face meeting with the participant, either at the W-2 agency or some other agreed upon location. At this meeting, the FEP must reassess the case. If the individual has consistently participated, the FEP must reassess whether barriers to employment exist. The FEP must also reconsider whether the individual is appropriate for a time limit extension.

The FEP must thoroughly document ~~on CARES screen~~ CMCG in PIN comments the details of the weekly meetings and the reassessment process as well as the reason(s) the participant is going to remain in the CMD placement, if that is the FEP's decision.

3.3.4.5 Federal Income Tax Refunds

The agency must disregard as an asset the entire amount of any federal tax refund for a period of 12 months from the date of receipt. The federal tax refund is considered disregarded income in the month received. (See 3.2.9.1)

When an individual is failing for exceeding the countable asset limit, the W-2 agency must ask the individual if he or she has received a federal tax return in the previous 12 months. If the individual reports a federal tax return, the W-2 agency must take the following steps:

1. Subtract the federal tax return amount from the amount of the individual's existing countable assets, enter the corrected amount into CWW, and run eligibility;
2. Enter a case comment ~~into CWW~~ explaining the adjustment to countable assets;
3. Verify the tax return amount (see 4.1.3); and
4. Scan any relevant documents into ECF.

If the W-2 agency subtracts the federal tax refund from multiple countable assets, W-2 agencies must specify in case comments the amount of the federal tax refund that was disregarded from each countable asset.

EXAMPLE 1 - APPLICANT

On April 2, 2011 Jackie applies for W-2. She provides a bank statement indicating she has a checking account with a \$3,000 balance.

The FEP must take the following actions:

- Enter the \$3,000 checking account into CWW;
- Complete the driver flow; and
- Run eligibility.

The CWW “Eligibility Run Results” page indicates that Jackie failed W-2 eligibility with a 024 reason code (countable assets are over program limits). Because Jackie failed W-2 eligibility for exceeding the asset limit, the FEP must ask Jackie if she received any state or federal income tax refunds in the past 12 months. Jackie tells the FEP that in February she received both a \$1,000 state income tax refund and a \$2,000 federal income tax refund, but she doesn’t have verification with her.

The FEP must take the following actions:

- Subtract the \$2000 federal tax refund from the CWW checking account entry;
- Change the verification for the asset “Type” and “Asset Amount” to “?–Not Yet Verified”;
- Request Jackie to verify her federal tax refund amount, and the date she received it;
- Enter a case comment in CWW indicating the amount and reason for the subtraction; and
- Run eligibility.

Note: the FEP does not need to take any action on the state refund because Jackie received it 2 months ago and state EITC payments are only disregarded as income and assets the month they are received.

A few days later, Jackie returns with verification that she received a \$2,000 federal tax refund on February 15, 2011.

The FEP must take the following actions:

- Change the verification for the asset “Type” and “Asset Amount” to indicate the type of verification Jackie provided; and
- Run eligibility.

EXAMPLE 2 - ONGOING CASE

On April 10, 2011, Laticia calls to report she just received a \$1,000 federal income tax refund and a \$430 state income tax refund. The state income tax refund is the result of the state EITC. Both the full federal income tax refund and the state income tax return that is the result of the EITC are disregarded as income in the month received.

The FEP must take the following actions:

- Enter a case comment in ~~CWW~~ identifying the amount of the tax refunds, the dates Laticia received them, and information on why the tax refunds were disregarded; and
- Follow the appropriate income tax disregard policy if Laticia fails W-2 eligibility for exceeding the asset limit in subsequent months.

4.1.5.2 Discrepancies and Alerts

Federal law requires *FEPs* to follow-up on all *IEVS DX* discrepancies identified during the DX process. FEPs must take action on IEVS DX discrepancies within 45 days for 80 percent of all discrepancies, including taking action to correct the case. The remaining 20 percent may exceed 45 days only if Third-Party Verification is outstanding. The FEP must take action on the remaining 20 percent no later than 90 days after the discrepancy was identified.

FEPs must take the following steps to process DX matches and follow-up on discrepancies:

1. **Identify discrepancies.** Once a discrepancy is set on a case, it displays in the information bar at the top of the page in CWW (next to Action Items and Documents).

The primary worker on the case will also see the discrepancy under the **My Tasks** section of the worker's **CARES Worker Web Home** page. Because in mixed cases, CWW considers IM workers the primary workers and FEPs secondary workers, FEPs cannot see their discrepancies on their **CARES Worker Web Home** pages. CWW notifies secondary workers of discrepancies by sending an alert. FEPs can then see their discrepancies by:

- a. Checking the Discrepancies list on the participant's **Case Summary** page;
- b. Searching for discrepancies using the **Caseload Management Search Criteria** page; or

- c. Using existing Webl reports to identify discrepancies.
2. **Review the information returned via the DX and compare it to information entered in CWW.**
3. **Contact the participant or a third-party source to resolve the discrepancy and request verification, if necessary.** The FEP must use the best available information to complete the data exchange process. The discrepancy must be resolved through the FEP's action within 45 days of the match date, unless third-party collateral evidence is outstanding.
4. **Update the appropriate CWW pages with the new information received.** If the income was from employment, the FEP must also review and, if needed, update employment information on the *WWP Work History* page. The FEP may also need to re-evaluate the individual's W-2 placement based on newly verified employment information.
5. **Run eligibility and confirm W-2 benefits.** If possible, FEPs must resolve discrepancies before running eligibility and confirming benefits. Re-running eligibility may result in a case closure. If this is the case, the FEP must also determine if an overpayment occurred and, if it has, calculate the amount and establish a benefit recovery claim.
6. **Update the status of the discrepancy.** If the FEP is the secondary worker, the FEP must provide a written update to the discrepancy in ~~case-level~~ case comments. If the FEP is the primary worker, the primary worker updates the status of the discrepancy by choosing one of the drop-down options.

Important Note: The secondary worker must not update the status of the discrepancy. If the secondary worker updates the status of the discrepancy, CWW will remove it from the information bar and from the primary worker's My Task discrepancy count total. If this occurs, the primary worker may not ever know that the discrepancy existed. However, if the primary worker updates the status of the discrepancy before the secondary worker has an opportunity to follow-up on it, the alert will remain for the secondary worker as a reminder. For that reason, in cases with both a primary and a secondary worker, the secondary worker must provide updates to discrepancies in ~~case-level~~ case comments.

The FEP should not verify information that has already been verified. (See [4.1.2](#)) Information such as identity, SSN, birth date, or citizenship, must be verified only once per lifetime. (See [4.1.4](#)) However, the FEP must verify employment and income at every eligibility review and when DX reports new information that changes frequently, such as earned and unearned income.

For more information on Data Exchange and IEVS, see [Process Help 44 Data Exchange](#).

4.3.1 Record of Verification

W-2 eligibility information requiring verification must be either “validated” or “documented.”

- **Validation** means placing original items of verification evidence (or a copy thereof) in the case file.

Validation may be done by:

1. Making a photocopy of an original document and then scanning it into ECF;
2. Using an IEVS match report;
3. Using a query response from SAVE; or
4. Using a CARES birth query result.

Photocopies of verification items should be marked with the date the document was obtained along with the initials of the staff person who obtained the document and scanned into ECF. (See [4.4.2](#)) If the validation occurred through a CARES DX (2 through 4 above), the verification code will automatically populate in CARES. When validating eligibility information, the worker is not required to enter case comments documenting how the eligibility criteria were verified.

- **Documentation** for the purposes of verifying W-2 eligibility information means describing the relevant verification evidence ~~in a case note~~ that is either entered as a case comment in CARES CWW or a case note scanned into ECF based on a conversation with the individual or an observation, inspection, conversation, or collateral contacts by the W-2 worker.

The worker must enter comments as a formal record of case action or ~~program-eligibility-~~related information for an individual within 24 hours after the action or contact with a participant. Such timely entering of case comments ensures a sequential history.

4.3.3 Case Comments

Case Comments for W-2 must be entered by workers using CARES and CARES Worker Web (CWW) and WWP. Workers must record comments within 24 hours after the action or contact with a participant to ensure a sequential history. When a FEP makes a change to a W-2 case that leaves eligibility unconfirmed for other programs, the FEP must notify the Income Maintenance (IM)/Child Care (CC) worker to confirm eligibility for the other programs. In addition to ~~case~~ comments, whenever the FEP or IM/CC worker makes a change in a case, the worker must also notify the other worker via e-mail, fax, or phone contact to ensure timely processing of the W-2, CC, and IM cases.

There are two types of ~~Case~~ ~~Comment~~ entries:

The first type, ~~Case level~~ comments, are entered into CWW. ~~Case level~~ comments should be entered when the interaction is describing a case level event that impacts eligibility issues, such as case reviews, verification, adding or deleting household members, etc.

The second type is ~~PIN-level~~ comments. ~~PIN-level~~ comments are entered in WWP on the mainframe. ~~To enter PIN level comments on the mainframe, use TRAN code <CMCC>, and put the following in the PARMS field: A//PIN for the individual.~~ ~~PIN-level~~ comments should be entered when the interaction is describing an individual ~~PIN level~~ event, such as good cause, informal assessment summary, general notes recording individual contact as it relates to work program participation, etc. ~~PIN-level Case~~ ~~Comments~~ are required as a formal record of all ~~case action or~~ Work pPrograms-related information for an individual.

~~W-2 agencies must cross-reference~~ may not disclose confidential information by only generally referencing the information in CARES screen CMCC comments and noting must note that further details are in ECF and/or the WWP Participant Barrier page. Below are examples of appropriate language that can be used when cross-referencing this information:

1. ~~“Participant has been referred for Mental Health. A a formal assessment. The assessment will be completed the week of March 20th for a total of 35 hours. See WWP **Participant Barrier** page for further details.”~~
2. ~~“Participant is currently receiving AODA treatment 10 hours per week. ECF contains assessments and treatment notes.”~~
- 3 2. ~~“Participant is currently restricted per completed medical capacity form to no more than 30 minutes of continuous sitting or standing. Participant is scheduled for surgery in two weeks. The doctor estimates a 12-week recovery period. Updated ANDI and AIWP accordingly. ECF contains complete medical information and diagnosis provided by the doctor.”~~

See 4.2.2.1 for a listing of confidential information that must never be entered in ~~Case~~ ~~Comments~~.

4.6.2 Transfers Between W-2 Agencies in Milwaukee County

For W-2 participants who relocate from one Milwaukee W-2 geographical area to another, the outgoing W-2 agency must transfer the case to the incoming W-2 agency.

When a Milwaukee W-2 agency initiates a case transfer, it must use the Inter-Regional W-2 Participant Transfer Notice form notifying participants to continue with assigned

activities until they have met with a *FEP* in the new geographical area. For more detailed information on the Milwaukee transfer process, workers must refer to the Inter-Regional Transfer Procedure for Milwaukee W-2 Agencies.

In order to complete the transfer to the new W-2 agency, the outgoing agency must transfer the case to the incoming agency's W-2 Eligibility and *WP* offices.

The incoming W-2 agency must keep the participant in the participant's existing W-2 placement and re-open assigned activities. The incoming W-2 agency must meet with the participant within 10 working days from the date of transfer as reflected on *CARES* screen WPTN. Once the FEP completes an informal assessment, he or she can make changes to the W-2 placement and assigned activities as well as provide supportive services or accommodations. The agency must document the assessment results in case PIN comments and on the appropriate *WWP* pages. For more information on transferring assessment information, see W-2 Manual, 4.6.3.

5.3.1 Educational Needs Assessment

The purpose of the educational needs assessment is to determine if the W-2 applicant or participant needs, or would benefit from, education and training activities:

1. A course of study meeting the standards established under Wis. Stat. s. 115.29 (4), for the granting of a declaration of equivalency of high school graduation;
2. Technical college courses;
3. Educational courses that provide an employment skill;
4. English as a second language (ESL) courses that the Wisconsin works agency determines would facilitate an individual's efforts to obtain employment;
5. Adult basic education courses, including literacy skills and remedial math and reading courses; and
6. Employer-sponsored training.

The W-2 agency is required to conduct an educational needs assessment with all new W-2 applicants and must reassess the participant for education and training needs before making a change in W-2 placement. The assessment must:

1. **Identify the applicant or participant's current educational levels.** Agencies must use a standardized educational assessment tool to determine educational levels if the FEP determines an educational needs assessment is needed. TABE, BEST, and TABE/CLAS-E are standardized educational assessment tools supported in *WWP*.

The FEP must never delay eligibility determination and placement because completion of a standardized educational needs assessment tool is pending. If

necessary to ensure timely placement, the FEP must use the best information available from the WWP Education History and Post-Secondary Education pages to fulfill the educational needs assessment requirement at application and inform the initial placement decision and EP.

For some applicants and participants, the self-reported information gathered through the WWP Informal Assessment Driver Flow may not accurately reflect current educational levels. When completion of a standardized educational needs assessment tool is necessary to determine or confirm the applicant or participant's current educational levels, the tool must be scheduled and documented in CARES within 30 days of placement. See [6.4](#) for information on assignment of activities in CARES.

For an individual who has demonstrated their reading and math skills through attainment of post-secondary education, a standardized educational assessment tool is not necessary. Postsecondary education includes completion of any coursework or education beyond high school such as a continuing education certificate, associate degree, or baccalaureate degree.

If a standardized assessment tool, such as TABE or BEST has been completed within the prior six months, the agency may use the results of that assessment to determine the applicant or participant's current educational level. It is not necessary to administer a new standardized educational assessment to the individual.

2. Determine the applicant or participant's education and training needs. In making this determination, the FEP must consider the following:

- a. The information gathered on the applicant or participant's current educational levels. The FEP must document this information on the appropriate WWP Informal Assessment pages (Education History, Post-Secondary Education), the WWP Test Scores Application, and in case PIN comments ~~on CARES screen CMCC~~.

No change to remainder of 5.3.1

5.5.1.2 How to Use a Formal Assessment

The FEP must use the *W-2 Formal Assessment Agreement (2565)* to help explain to the applicant or participant the purpose of the formal assessment and the type of follow-up services and activities that may result from completing it. It is critical that the FEP explain the formal assessment process using positive language that reinforces how the applicant or participant may benefit from completing it. Through the discussion, the

applicant or participant must be made aware that assessment results will enable the individual and his or her FEP to make informed decisions about:

- his or her W-2 placement;
- his or her employment goals and the activities that will help reach those goals;
- his or her ability to engage in training and education; and
- any special services and work site accommodations that he or she may need.

The applicant or participant must indicate at the bottom of the agreement his or her decision to complete or decline a formal assessment.

The FEP must use the best information available from an informal assessment to initially place an individual in an employment position when a formal assessment is pending. Participating in a formal assessment may be counted as participation in an employment position. The FEP must document all formal assessment information in WWP and CARES utilizing the WWP Participant Barriers and Family Barriers pages and CARES screens, including ease PIN comments, as appropriate.

Within 30 days after receiving the results of the formal assessment, the FEP must make necessary adjustments to the participant's placement and revise the *EP* based on the formal assessment. The services and accommodations that are recommended in the formal assessment to help a participant succeed in a work setting must be incorporated into the participant's EP.

No change to remainder of 5.5.1.2

6.2.2 Employability Plan Review

An EP review must be scheduled to occur before the date the EP is set to expire. This will ensure a review is scheduled at least once every 6 months. EP reviews may occur more frequently as needed, particularly if the participant is nearing a time limit.

The purpose of an EP review is to discuss with the participant his or her goals and currently assigned activities and determine if adjustments are needed to help move the individual towards his or her employment goal.

The EP review must be completed during a face-to-face meeting except in the following circumstances:

1. When there are extreme circumstances that prevent a participant from coming to the agency such as when a participant is hospitalized or homebound due to illness.
2. When a TEMP, CMF, CMF+, or CMU participant has a work schedule that makes it difficult to come into the office for a face-to-face EP appointment.

When one of these circumstances prevent a participant from coming to the agency, the worker must either conduct a home visit or communicate with the participant by phone to ensure that the participant has the opportunity to provide input into the development of the EP and understands what is expected of him or her.

When an EP review is conducted by phone, the EP must be mailed to the participant for signature and returned to the agency. The worker must document in CARES case PIN comments how the EP was distributed and the date it was distributed.

If an EP review does not occur before the date the EP is set to expire because the participant fails to keep an EP review appointment without good cause, the W-2 agency may close the case for noncooperation with program requirements. (See [11.4](#))

7.1 Introduction

When determining the initial placement for W-2 applicants, FEPs must use all of the information gathered from the:

- Informal assessment (see [5.2](#));
- *Educational Needs Assessment* (see [5.3](#));
- Any *Career Assessment* results that identify work styles, skills, and interests (see [5.4](#));
- Progress made in up-front job search, if assigned (see [2.9.2](#)); and
- Results of any other *Vocational Evaluation/Assessment* or formal assessments (see [5.1.1](#)).

When making initial placements, FEP must also:

- Discuss and review the factors impacting the placement decision with the applicant;
- Never delay placement because a formal assessment is pending (see [5.1.1.2](#)), and
- Document the reasons for the placement decision in ~~case~~ PIN comments.
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FEPs are required to provide ongoing case management which includes periodic reassessment of the current placement. Depending on circumstances at the time, the

individual's appropriateness for a particular placement may change. Participants must always be placed at the highest level of participation possible.

The W-2 program has the placement options described in this chapter. Some placements are specifically for applicants and others are specifically for ongoing participants.

7.2.3 Case Management Follow-Up (CMF)

Participants who find unsubsidized employment while in W-2 who were previously in a paid placement are eligible for case management follow-up services; this includes *TEMP*, *CSJ*, *W-2 T*, and *CMC*. The goal of case management follow-up services is to give participants the assistance they need to stay employed and advance in their career. W-2 agencies must provide up to 12 consecutive months of follow-up services to participants who find employment while in W-2. W-2 case management follow-up services can be provided even after the participant loses financial eligibility. (See 7.2.3.4)

CARES will close CMF or CMF+ cases at the end of 12 months. If a CMF or CMF+ placement lasts less than 12 months, the *FEP* must document the reason(s) in case PIN comments. If a participant wishes to receive case management follow-up services beyond the 12 consecutive months allowable in a CMF and CMF+ placement, the FEP may change the participant's placement to *CMU* if the participant meets financial and nonfinancial eligibility requirements.

7.2.3.4 CMF and CMF+ Eligibility Requirements

W-2 participants that have obtained unsubsidized employment may transition from a paid placement to a CMF or CMF+ placement and are eligible for case management follow-up services only if they continue to meet all nonfinancial eligibility requirements. When determining CMF and CMF+ eligibility, the FEP must exclude income and assets.

If an individual who is transitioning from a paid placement to a CMF or CMF+ placement has a work schedule that makes it difficult to come into the office for face-to-face eligibility reviews and EP appointments, the agency may conduct the appointments by phone. (See 6.2.1 and 6.2.2)

EXAMPLE 1: Caitlyn has one child and was in a CSJ placement for four months. She began a new job that pays \$10 an hour for 40 hours per week. At the EP appointment, the FEP verifies her employment and wages and changes her placement to CMF. Based on her W-2 group size and income level, Caitlyn no longer meets the financial eligibility requirement for most W-2 services; however, CMF

placements exclude income and assets when determining eligibility. Caitlyn continues to meet all of the nonfinancial eligibility requirements listed in Section 2.2.1. Therefore, she is eligible for case management follow-up services.

EXAMPLE 2: Ben has custody of his two minor children and has been working as a mechanic for six months. The FEP changed his W-2 placement to CMF when Ben originally reported his employment when he started working. The FEP completes a six-month eligibility review over the phone with Ben. During the review, Ben tells the FEP that his former spouse regained custody of both children last month. The FEP will end Ben's CMF placement because he no longer meets the W-2 nonfinancial eligibility requirements. The FEP will close Ben's W-2 case, disenroll from Work Programs, and enter in case PIN comments the reason why Ben's CMF placement is less than 12 months.

7.2.4.3 General CMJ Participant Description Characteristics

For the W-2 agency to determine that an individual is appropriate for a CMJ placement, all of the following must apply:

1. The individual is willing to work. Because W-2 is a work program, individuals who apply for the program are assumed to be willing to work.
2. The individual has no barriers to work that cannot be addressed with W-2 services so that the individual is ready for immediate employment within 30 days.

Below are examples of barriers that the W-2 agency can address through services:

- Child care subsidies through Wisconsin Shares and help locating child care;
- Housing assistance through Emergency Assistance, W-2 supportive services funds, and/or referrals to other local housing programs;
- Transportation assistance through W-2 supportive services funds, a Job Access Loan and/or referrals to other local transportation assistance programs;
- Help paying for work related expenses through W-2 supportive services funds, a Job Access Loan and/or referrals to other local assistance programs; and
- Help completing a resume, providing targeted job leads, job coaching, job development, etc.

Individuals who have more significant barriers, e.g., physical or mental impairments, family issues, legal problems, etc., that take longer than 30 days to resolve are not appropriate for CMJ.

If the FEP identifies barriers that can be addressed through W-2 services so that the individual is ready for immediate employment, the barriers and the services that will address those barriers must be documented on appropriate *WWP* and *CARES* screens including:

- WWP Participant Barriers page;
- WWP Family Barriers page;
- Employability Plan CARES screens WPJS and WPAS; and
- Additional details must be documented in ~~case~~ PIN comments. (See 4.3.3)

No change to remainder of 7.2.4.3

7.2.4.7 30-Day Review

Every 30 days, the W-2 agency must review the appropriateness of the CMJ placement.

Overall, the 30-day reassessment focuses on the level of effort required for CMJ participants to complete the requirements. When participants have exhibited the level of effort required to get a job, but remain unemployed, they must be placed in a W-2 paid placement at the 30-day review point. When participants have not exhibited the level of effort required to get a job, and they do not have any barriers to work, and the W-2 agency has provided appropriate case management services, or they request to continue in the CMJ placement, the W-2 agency may keep the participant in the CMJ placement for another 30-day period or end the CMJ placement depending upon the circumstances of the case. (See 7.2.4.8)

In determining the level of effort of the CMJ participant, the following must be considered during the CMJ 30-day reassessment:

1. Was the participant given multiple specific job leads in the local labor market that matched the participant's skills, abilities, and interests?
2. Did the participant get any job offers in the local labor market compatible with the participant's skills, abilities, and interests?
3. Did the participant refuse or fail to apply for any jobs in the local labor market compatible with the participant's skills, abilities, and interests?
4. What were the reasons the participant did not get a job in the local labor market or did not apply for a job(s), e.g., poor interview skills, poor

presentation, another individual was more qualified, criminal background, did not possess the minimum qualifications or education and training, or did not pass the examination?

5. Were W-2 participants with similar skills, abilities, and interests able to secure jobs in the local labor market?
6. Did the participant have previously identified barriers that could be addressed with W-2 services? If so, were the services effective? Did the participant have previously unidentified barriers preventing him or her from obtaining unsubsidized employment? If yes, please identify the barriers and what services the agency will provide to address the barrier(s).

The FEP does not have to wait for the 30-day review period to move a CMJ participant to a paid W-2 employment position. At the weekly meetings, the FEP must discuss with the participant any barriers that may be preventing the participant from obtaining employment, including housing, transportation, child care and other family matters.

The results of the 30-day review must be documented in ~~case~~ PIN comments. FEPs must document the decision (retain an individual in the CMJ placement, move the individual to a paid placement or end the CMJ placement) and the reasons for the decision.

7.2.5 Denying or Terminating an Unsubsidized Employment Case Management Placement

If any individual placed in a CMD, CMU, CMF, CMF+, or CMJ declines case management services or does not participate, the FEP must terminate eligibility for the placement. CWW will issue a W-2 denial notice. If the participant refuses case management services, the FEP must document the refusal in PIN comments ~~on CARES~~ screen CMCC.

As case management placements, there is no hourly payment reduction for noncooperation in CMD, CMU, CMF, CMF+, or CMJ. However, the FEP may close a CMD or CMJ placement if the individual is not cooperating with job search requirements, fails to come in for his or her EP review appointment, or loses contact with the FEP. If a CMU, CMF, or CMF+ participant fails to come in or call in to his or her EP or eligibility review appointment or loses contact with the FEP, the FEP should close the CMF, CMF+, or CMU placement. Eligibility reviews must be conducted at least every six months to maintain nonfinancial eligibility.

In addition, job refusal could affect future W-2 eligibility. (See 180 day policy - Manual Section [2.2.1](#))

7.4.4.1 SSI/SSDI Transition Plan

The case manager may begin to develop a written Transition Plan with the participant early in the SSI advocacy process using the automated SSI/SSDI Transition Plan. This can be accessed from the [W-2 Plans Application webpage](#).

The Transition Plan must be developed during a face to face meeting between the FEP and the participant. Once there is a formal decision handed down from the Social Security Administration regarding eligibility for SSI/SSDI the Transition Plan should be finalized with the participant. The final Transition Plan should be issued to the participant no sooner than 90 days prior to W-2 eligibility ending and reviewed regularly with the participant up until W-2 eligibility ends. The case manager must document in CARES case PIN comments when the final plan was printed and given to the participant.

7.6.1 W-2 Supportive Service Plan

The W-2 agency must offer assistance in developing a Supportive Service Plan with:

1. Applicants who withdraw their W-2 applications prior to W-2 placement. In this circumstance, the Supportive Service Plan would generally be developed between the Resource Specialist and the applicant.
2. Participants who are approved or denied a time limit extension.
3. Participants who are placed in a case management placement, including: CMF, CMF+, CMU, CMD, CMJ, CMN, CMM, CMP, and TSP.

The Supportive Service Plan must be developed during a face-to-face meeting between the case manager and the applicant or participant using either:

1. The automated W-2 Supportive Service Plan. This can be accessed from the [W-2 Plans Application webpage](#); or
2. The paper version of the [W-2 Supportive Service Plan \(12956\)](#).

The automated plan cannot be accessed until after an applicant has been referred to CARES Work Programs. When developing a Supportive Service Plan with an applicant who withdraws his or her W-2 application prior to placement and no referral to CARES Work Programs was made, the worker must use a paper version of the plan.

If a case has been established in CARES, the worker must document in CARES case PIN comments when the plan was printed and given to the individual. If the paper version of the Supportive Service Plan was used the worker must also scan the form into ECF.

An applicant or participant may refuse the offer to develop a Supportive Service Plan. If this occurs, the refusal should be documented in ~~CARES case~~ PIN comments.

8.3.2.3 Aggregating Education and Training Hours

The FEP may aggregate education and training hours to allow W-2 T and CSJ participants access to short-term intensive training programs that require more than 10 or 12 hours of participation per week. Totalling education and training hours in this manner allows the FEP to place the CSJ or W-2 T participant in a short-term program.

The aggregation policy can be applied and should be considered for education and training programs that a participant can complete within a one-year period with participation in up to 516 hours of education and training activity. In addition to the education and training activities, the FEP must assign some work training activities each week, not to exceed a total of 40 hours of participation per week.

In the ~~case~~ comments section of the EP or in PIN comments, the FEP must document that the aggregation policy was used, the amount of aggregated education and training hours, the occupational skills to be gained, and the expected number of weeks needed to complete the training.

Wisconsin's Technical College system offers many one- and two- semester certificate programs that are accessible to W-2 participants under the aggregated education and training policy.

No change to remainder of 8.3.2.3

8.3.2.5 Full-Time Technical College Education

An individual placed in a CSJ or W-2 T may participate in a full-time technical college education program when specific requirements listed below are met. An individual may participate for the duration of the program but for no longer than 2 years as long as the agency has determined that the program will likely lead to employment. An agency must consult with its Community Steering Committee and local technical college board to determine if a technical college education program will likely lead to employment. Agencies are encouraged to detail their own internal policies governing how appropriate programs will be identified and how FEPs will make a determination for placement in a technical college education program. In all circumstances, the decision should be documented in ~~case~~ PIN comments.

No change to remainder of 8.3.2.5

11.2.3 Approving or Denying Good Cause

FEPs are responsible for determining if a W-2 participant had good cause for not participating in W-2 assigned activities. While the good cause policy is meant to model what an employer may allow under its own absence policy, FEPs must consider the fact that participants may face hardships that make completing activities and notifying the agency of missed activities more difficult, e.g., phone availability, reliable transportation, etc.

If the FEP determines that the participant's explanation for the absence or the written verification of the absence meets the allowable good cause reasons, the FEP must enter the hours of nonparticipation, the appropriate number of good cause hours, and the good cause CARES code on CARES screen WPNH and document the reason for approving the good cause in ~~case~~ PIN comments. If the FEP determines that the participant's explanation for the absence or the written verification of the absence does not meet any of the allowable good cause reasons, the FEP must enter the hours of nonparticipation on CARES screen WPNH and document the reason for denying good cause as well as referencing the number of hours, dates and activities missed in ~~case~~ PIN comments.

When documenting in ~~CMCG~~ the reasons for approving or denying good cause, the FEP must ~~begin the comment with "GCD:"~~. ~~By starting case comments with "GCD:",~~ use the **Good Cause Determination** Comment Type so monitoring staff will be able to easily identify comments related to good cause decisions.

11.2.4.2 Verifying Good Cause

If the FEP determines that written verification is necessary for a pattern of absences, the FEP must first check in the Electronic Case File (ECF) to ensure that written verification does not already exist. Examples of written documentation include a signed medical statement, an update to existing medical information from a licensed physician or some other qualified assessing agency, etc. If it does not, the participant must be informed in writing of the verification items required, including the due date. The FEP must give the participant 7 working days from the date the good cause request is made to provide the written documentation. The FEP must document in ~~case~~ PIN comments-~~(CMCG)~~ using the **Good Cause Determination** Comment Type why the written documentation verifying good cause is required ~~and the FEP must begin the comment with "GCD:"~~.

No change to remainder of 11.2.4.2

11.4.2.1 Exploring Potential Barriers

W-2 informal assessment policy requires FEPs to conduct ongoing informal assessments, which includes the need to discuss with the participant any underlying causes of noncooperation. (See Chapter 5) The FEP must explore potential barriers that may be interfering with a participant's ability to cooperate and take steps to address those barriers prior to closing a W-2 case for noncooperation reasons.

Before closing a case for noncooperation, the FEP has a responsibility to:

1. **Initiate action to uncover why the participant has not completed the required activity in the event that unidentified barriers exist.** FEPs must document thoroughly in case PIN comments as well as on the appropriate CARES screens and *WWP* pages actions taken to uncover barriers that may be contributing to the noncooperation or other good cause reasons for failing to cooperate.

No change to remainder of 11.4.2.1

11.5.2 Good Cause for Incarcerated Participants

Although incarcerated W-2 participants may remain eligible to receive W-2 benefits, incarceration will generally not be considered good cause for not participating in required work activities. Hours of work activities missed because of incarceration will result in payment reductions in the same manner as any other hours missed without good cause, unless the W-2 agency finds extenuating circumstances relating to the incarceration or determines that the incarceration resulted from a situation beyond the participant's control. The *FEP* must determine this on a case-by-case basis and document the reason in case PIN comments.

No change to remainder of 11.5.2

18.2.2.3 Completing the RCA Application

No later than 5 working days after the date the agency receives a signed [Wisconsin Works \(W-2\) and Related Programs Registration \(14880\)](#) (see [18.2.2.2](#)), the W-2 agency must schedule and hold a personal interview between the [Financial and Employment Planner \(FEP\)](#) and the applicant. During this interactive interview the [FEP](#) gathers information about the RCA group's financial and nonfinancial eligibility. While RCA eligibility cannot be tested through [CARES](#) and RCA payments are not issued through CARES/CWW, the FEP should enter the collected financial and nonfinancial eligibility information into CARES so that the information can be properly stored and later accessed. If the applicant has applied for other programs administered through CARES, the information may already be present in the system. In such cases, the FEP should update the CARES information as necessary to ensure that it is correct and up-to-date.

All applicants requesting RCA services must complete and sign an RCA application, either:

- The Application Summary that prints out of [CWW](#) at the completion of the interactive interview, or
- The [Wisconsin Works \(W-2\) and Related Programs Application \(2471\)](#) paper form, which is equivalent to the Application Summary and can be used when the CARES system is unavailable.

Note: The FEP should request W-2 in order for CWW to issue the Application Summary at the completion of the interactive interview. The FEP should remember to suppress any generated W-2 notices so as not to confuse the applicant.

All other adults in the RCA [assistance group](#) must also sign the RCA application.

By signing the RCA application, the individual attests that:

- All information provided in the application is correct and complete and
- He or she understands and agrees to basic policies of the RCA program, such as the fraud rules and the right of the W-2 agency to request and receive information from other sources.

A home visit may be conducted as a reasonable accommodation for someone in order to secure his or her signature. When a home visit is required, the FEP must document the date of the home visit [in case comments](#) ~~on CARES screen CMCG~~.

No change to remainder of 18.2.2.3

19.1 Emergency Payments

W-2 agencies must determine eligibility for an emergency payment for a participant who has an emergency need and is awaiting a first W-2 payment. Participants in a *CSJ* placement, *CMC* placement, and *W-2 T* placement, are eligible in the period prior to their first W-2 payment.

Emergency payments are one-time payments designed to meet an emergency need at the beginning of a W-2 episode. They are not an additional W-2 benefit. Emergency payments do not use a month of *TANF* assistance because they qualify as non-recurrent, short-term benefits under the *TANF* definition of assistance.

Emergency payments may be used for needs such as shelter, food and work-related expenses, etc. They should be used in conjunction with other supports available to participants including *EA*.

There is no limit on the emergency payment amount; each W-2 agency may choose to establish a range of payments (e.g., between \$25 and \$750). The W-2 agency may also choose to limit the payment to no more than once every 12 months. Participants are not required to repay emergency payments.

Emergency payments are not tracked through the *CARES* system, though workers should enter information about the payment in the case PIN comments if a participant has received this payment.

Wisconsin Works Documentation, Verification and Supervision Criteria

From page 4:

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|---------------------------|--|---|--|
| Employment Search (cont.) | Self-Directed Job Search Participants pursue job leads given to them by W-2 agency or identified on their own and discussed with the agency. Minimum information captured on documentation: <ol style="list-style-type: none">1. Date2. Participant's Name3. Employer Contacted4. Position of Interest | Self-Directed Job Search W-2 agency is required to obtain individual activity logs on a weekly basis. W-2 agency must conduct random follow-up on a minimum of 25% of a | Self-Directed Job Search Case Manager will have a minimum of weekly contact (phone or face-to-face) with participant to discuss various job leads and progress made on employment contacts – discussions documented in case <u>PIN</u> comments |
|---------------------------|--|---|--|

Operations Memo 20-05 Attachment

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| | <p>5. Start Time 6. End Time 7. Daily Actual Hours (a formula approach is not acceptable; hours must be actual) 8. Person Contacted 9. Contact Information 10. Activity Description, e.g., looking for suitable job opportunities, contacting potential employers, applying for job, interviews, follow-up contact. 11. Contact verification certification of at least 25% of weekly contacts. 12. Signature of W-2 agency staff verifying contact.</p> <p>Method(s) of documentation:</p> <ul style="list-style-type: none"> Individual Activity Log | <p>participant's weekly contacts with employers identified on the individual activity log to verify information and confirm contacts. Follow-up may be completed via phone calls, business cards or other collateral information. e.g., fax cover sheets for resume or application submittal, e-mail or other mail correspondence responding to application or resume submittal, etc..</p> | <p>Case Manager signs individual activity log.</p> |
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From page 13:

| | | | |
|---|--|--|---|
| <ul style="list-style-type: none"> Domestic Violence Assessment & Supportive Services (AV) Caring for Disabled Child (CD) Caring for Other Family Member (CF) Family Member Treatment/Counseling (FC) Ongoing Medical/Personal Care (MP) SS(D)I Advocacy/Application (SD) | <p>Appropriate assessment documentation or required DFES forms constitute documentation.</p> | <p>W-2 agency is required to document in the case file (either <u>CARES case PIN</u> comments or ECF) ongoing quality case management practices. At a minimum, this includes documenting monthly contact with participant.</p> | <p>FEP will have contact (phone or face-to-face) at least once a month with participant to discuss progress in activities determined appropriate by the W-2 agency.</p> |
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From page 14:

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| <p>Up-front Employment Search (UE)**</p> | <p>Facilitated Job Search – Individual or group activity led by Job Center or W-2 staff or some other facilitator, e.g. Job Club.</p> <p>Minimum information captured on documentation:</p> <ol style="list-style-type: none"> Participant's Name Start Time | <p><u>Facilitated Job Search</u> – W-2 agency is required to obtain individual activity logs.</p> <p>It is primarily the W-2 participant's responsibility to have the authorized staff person, e.g., W-2 agency staff, Job Center</p> | <p><u>Facilitated Job Search</u> Authorized staff person, e.g., W-2 agency staff, Job Center staff, workshop facilitator, etc. supervises activity</p> |
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Operations Memo 20-05 Attachment

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| | <p>3. End Time 4. Daily Actual Hours 5. Activity Description 6. Supervisor's Signature/Electronic Signature (on individual activity logs) 7. Supervisor's Phone Number</p> <p>Method(s) of documentation:</p> <ul style="list-style-type: none"> • Individual activity log • Sign-in sheets • Electronic printout based on swipe card, or time clock system <p><u>Self-Directed Job Search</u> Participants pursue job leads given to them by W-2 agency or identified on their own and discussed with the agency.</p> | <p>staff, workshop facilitator, etc. sign the documentation and submit it at least twice a month.</p> <p><u>Self-Directed Job Search</u> W-2 agency is required to obtain individual activity logs on a weekly basis. W-2 agency must conduct random follow-up on a minimum of 25% of a</p> | <p><u>Self-Directed Job Search</u> Case Manager will have a minimum of weekly contact (phone or face-to-face) with participant to discuss various job leads and progress made on employment contacts – discussions documented in case PIN comments</p> |
|--|--|--|---|

No change to remainder of the chart